

EXHIBIT “H”
Initial Disc. County/Mayfield
(second updated)

William B. Rowell, Bar No. 178587
 Thiele R. Dunaway, Bar No. 130953
 Marc Brainich, Bar No. 191034
 Michele C. Kirrane, Bar No. 215448
FENNEMORE WENDEL
 1111 Broadway, 24th Floor
 Oakland, CA 94607
 Tel: (510) 834-6600 / Fax: (510) 834-1928
 browell@fennemorelaw.com
 rdunaway@fennemorelaw.com
 mbrainich@fennemorelaw.com
 mkirrane@fennemorelaw.com

Attorneys for Defendants
 County of Alameda and Alameda County Deputy
 Sheriff Joshua Mayfield

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

JOSEPH P. CUVIELLO and DENIZ
 BOLBOL, individually,

Plaintiffs,

v.

ROWELL RANCH RODEO, INC.;
 HAYWARD AREA RECREATION AND
 PARK DISTRICT; HAYWARD AREA
 RECREATION AND PARK DISTRICT
 PUBLIC SAFETY MANAGER/RANGER
 KEVIN HART; ALAMEDA COUNTY
 SHERIFF'S OFFICE; ALAMEDA COUNTY
 DEPUTY SHERIFF JOSHUA MAYFIELD;
 and DOES 1 and 2, in their individual and
 official capacities, jointly and severally,

Defendants.

Case No. 3:23-cv-01652-VC

**DEFENDANTS COUNTY OF
 ALAMEDA AND ALAMEDA COUNTY
 DEPUTY SHERIFF JOSHUA
 MAYFIELD'S SECOND UPDATED
 RULE 26 DISCLOSURES**

Action Filed: April 6, 2023
 Trial: October 21, 2024

Pursuant to Federal Rule of Civil Procedure Rule 26(a)(1) and (e), Defendants the County of Alameda and Alameda County Deputy Sheriff Joshua Mayfield ("Defendants"), by and through their undersigned counsel, makes the following updated disclosures. Defendants reserve the right to supplement, update, amend or modify these disclosures when and if additional information becomes available.

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

Defendants identify at this time the following individuals likely to have discoverable information that Defendants may use to support their claims and defenses. Each of the following individuals may have information regarding the subject incident alleged in plaintiffs' Second Verified Amended Complaint, and/or regarding relevant events prior to the subject incident.

- Plaintiff Joseph P. CuvIELLO. This individual has information about the subject incident.
- Plaintiff Deniz Bolbol. This individual has information about the subject incident.
- Defendant Alameda County Deputy Sheriff Joshua Mayfield. Business address: 1401 Lakeside Drive, Oakland, CA. Deputy Mayfield may only be contacted through his counsel in this matter. Dep. Mayfield has information about the subject incident.
- County of Alameda Sheriff's Office Deputy Sheriff Matthew Laszuk. Business address: 1401 Lakeside Drive, Oakland, CA. Deputy Laszuk may only be contacted only through counsel for the County of Alameda in this matter. Dep. Laszuk has information about the subject incident.
- County of Alameda Sheriff's Office Deputy Sheriff Christian Campbell. Business address: 1401 Lakeside Drive, Oakland, CA. Deputy Campbell may only be contacted only through counsel for the County of Alameda in this matter. Dep. Campbell has information about the subject incident.
- County of Alameda Sheriff's Office Deputy Sheriff Sowmya Ramadas. Business address: 1401 Lakeside Drive, Oakland, CA. Deputy Ramadas may only be contacted through counsel for the County of Alameda in this matter. Dep. Ramadas has information about the subject incident.
- County of Alameda Sheriff's Office Sgt. Moises Gomez. Business address: 1401 Lakeside Drive, Oakland, CA. Sgt. Gomez may only be contacted through counsel

for the County of Alameda in this matter. Dep. Gomez took a telephone call from Dep. Mayfield during the incident. He also has information about the Sheriff's Office's provision of a law enforcement presence at the Rowell Ranch Rodeo in May 2022 as well as in other years.

- County of Alameda Sheriff's Office Deputy Sheriff Colby Staysa. Business address: 1401 Lakeside Drive, Oakland, CA. Deputy Sheriff Staysa may only be contacted through counsel for the County of Alameda in this matter. Deputy Sheriff Staysa has information regarding Sheriff's Office' relations with Rowell Ranch Rodeo in past years. He also has information about the Sheriff's Office's provision of a law enforcement presence at the Rowell Ranch Rodeo in May 2022 as well as in other years.
- County of Alameda Sheriff's Office Emergency Dispatch Services Operator Melissa McMaster. Ms. McMaster may only be contacted through counsel for the County of Alameda in this matter. Ms. McMaster took the telephone call from Gary Houts during the incident.
- County of Alameda Sheriff's Office Emergency Dispatch Services Operator Amy Bowles. Ms. Bowles may only be contacted through counsel for the County of Alameda in this matter. Ms. Bowles called Dep. Mayfield on the radio during the incident.
- County of Alameda Sheriff's Office Emergency Dispatch Services Supervisor. Kristyn Ostlund. Ms. Ostlund may only be contacted through counsel for the County of Alameda in this matter. Ms. Ostlund prepared the Event Register previously produced by the County of Alameda in this action.
- County of Alameda Sheriff's Office Detective. Patrick M. Smyth. Business address: 1401 Lakeside Drive, Oakland, CA. Det. Smyth may only be contacted through counsel for the County of Alameda in this matter. Det. Smyth has

information regarding the Sheriff's Office' training, policies, and procedures regarding free speech issues.

- Rowell Ranch Rodeo President and Arena Boss Russell Fields, c/o counsel for Rowell Ranch Rodeo. Mr. Fields may have information about the subject incident
- Rowell Ranch Rodeo Site Boss Brian Morrison, c/o counsel for Rowell Ranch Rodeo. Mr. Morrison may have information about the subject incident.
- Rowell Ranch Rodeo volunteer Ashley Strassberg, c/o counsel for Rowell Ranch Rodeo. Ms. Strassberg may have information about the subject incident.
- Michael Sage, 3636 Eastwood Circle, Santa Clara, CA, 408-857-9611; telephone number 408-857-9611. Mr. Sage may have information about the subject incident.
- Robyn Newkirk, 32 Old Landing Road, Tiburon, CA, 94921; telephone number 415-686-6592. Ms. Newkirk may have information about the subject incident.
- Other employees and or volunteers of defendants Hayward Area Recreation and Park District and Rowell Ranch Rodeo, Inc. present at the rodeo on the day of the incident, identified in defendants' discovery responses and documents produced by them, or currently unidentified. These individuals may have information about the subject incident.
- Attendees at the Rowell Ranch Rodeo present at the rodeo on the day of the incident currently unidentified. These individuals may have information about the subject incident.

B. DOCUMENTS UPON WHICH DEFENDANTS MAY RELY IN SUPPORT OF THEIR CLAIMS AND DEFENSES

Defendants identify at this time the following documents, electronically stored information, and tangible things that defendants may use to support their claims and defenses:

- Claim Against the County of Alameda submitted by Joseph P. Cuvillo, dated November 4, 2022.

- 1 • Claim Against the County of Alameda submitted by Deniz Bolbol, dated
2 November 3, 2022.
- 3 • Documents previously produced by the County of Alameda, Bates-stamped
4 AlamedaCounty_Bolbol_000001 through AlamedaCounty_Bolbol_000413.
- 5 • Body cam videos taken by Alameda County deputy sheriffs Joshua Mayfield,
6 Sowmaya Ramadas, Christian Campbell, and Matthew Laszuk on the day of the
7 incident. These body cam videos have been produced to the parties.
- 8 • An audio recording from the Sheriff's Office, containing the calls between
9 Emergency Dispatch Services Operator Melissa McMaster and Gary Houts, and
10 between Emergency Dispatch Services Operator Amy Bowles and Dep. Joshua
11 Mayfield, dated May 20, 2022, previously produced to the parties on December
12 21, 2023.
- 13 • A transcript of the above-referenced body cam videos taken by the Sheriff's
14 Office, with the court reporter's affidavit of authenticity, Bates-stamped
15 AlamedaCounty_Bolbol_000342 through AlamedaCounty_Bolbol_000367.
- 16 • Training Bulletin No. 13-13, "Peaceful Picketing During Labor Disputes," dated
17 June 19, 2013; and Training Bulletin No. 15-10, "Filing of Law Enforcement by
18 the Public," dated June 26, 2015. These two documents are Bates-stamped
19 AlamedaCounty_Bolbol_000316 through AlamedaCounty_Bolbol_000320, and
20 are being concurrently produced as responsive to plaintiffs' Requests for
21 Production.
- 22 • A set of Powerpoint slides used by Det. Patrick Smyth of the Alameda County
23 Sheriff's Office for his course for Learning Domain 2, The Criminal Justice
24 System, Bates-stamped AlamedaCounty_Bolbol_000321 through
25 AlamedaCounty_Bolbol_000341, and being concurrently produced as responsive
26 to plaintiffs' Requests for Production.

- Videos taken by plaintiffs Joseph CuvIELlo and Deniz Bolbol at the Rowell Ranch Rodeo on May 20 and May 21, 2022.
- Transcripts of the videos taken by plaintiffs Joseph CuvIELlo and Deniz Bolbol at the Rowell Ranch Rodeo on May 20, 2022, with the court reporter's affidavit of authenticity, Bates-stamped AlamedaCounty_Bolbol_000368 through AlamedaCounty_Bolbol_000396, and are being concurrently produced as responsive to plaintiffs' Requests for Production.
- Annotated satellite photograph of Rowell Ranch; exhibit #1 to the depositions of plaintiffs Joseph P. CuvIELlo and Deniz Bolbol's depositions.
- All other documents produced by the parties to this action.
- Transcripts and exhibits of all depositions taken in this action, and the exhibits thereto, including but not limited to the annotated satellite map attached to plaintiffs' depositions.

C. DAMAGES

Defendants will seek reasonable attorney's fees and costs pursuant to 42 U.S.C. § 1988.

D. INSURANCE

The County of Alameda, a public entity, is permissibly self-insured pursuant to California Government Code §§ 990 et seq. To the extent any liability insurance policy covers plaintiffs' claims, the County will make it available for inspection and copying.

Dated: April 23, 2024

FENNEMORE WENDEL

By: 

William B. Rowell
Thiele R. Dunaway
Marc Brainich
Michele C. Kirrane
Attorneys for Defendants
County of Alameda and Alameda County
Deputy Sheriff Joshua Mayfield

- 6 -

CERTIFICATE OF SERVICE

Joseph P. CuvIELLO, et al. v. Rowell Ranch Rodeo, Inc., et al.
USDC – Northern District of California, Case No. 3:23-cv-01652-VC

I am a citizen of the United States and employed in Alameda County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 1111 Broadway, 24th Floor, Oakland, California 94607.

On April 23, 2024, I served true copies of the following document(s) described as **DEFENDANTS COUNTY OF ALAMEDA AND ALAMEDA COUNTY DEPUTY SHERIFF JOSHUA MAYFIELD'S SECOND UPDATED RULE 26 DISCLOSURES** on the interested parties in this action as follows:

Please see attached Service List.

BY EMAIL OR ELECTRONIC TRANSMISSION: By causing the document(s) listed above to be sent to the person(s) at the e-mail address(es) listed below. I did not receive, within a reasonable time after transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on April 23, 2024, at Oakland, California.



Lena S. Mason

SERVICE LIST

Joseph P. CuvIELlo, et al. v. Rowell Ranch Rodeo, Inc., et al.
USDC – Northern District of California, Case No. 3:23-cv-01652-VC

Jessica L. Blome *Attorneys for Plaintiff Deniz Bolbol*
Lily A. Rivo
Greenfire Law, PC
2748 Adeline Street, Suite A
Berkeley, CA 94703
Phone: (510) 900-9502
Email: jblome@greenfirelaw.com
lrivo@greenfirelaw.com

Joseph P. CuvIELlo *Plaintiff Pro Per*
205 DeAnza Boulevard, #125
San Mateo, CA 94402
Phone: (650) 315-3776
Email: pcuvie@gmail.com

Dale L. Allen, Jr. *Attorneys for Defendants Hayward Area*
Nicholas D. Syren *Recreation and Park District, and Kevin*
Allen, Glaessner, Hazelwood & Werth, LLP *Hart*
180 Montgomery Street, Suite 1200
San Francisco, CA 94104
Phone: (415) 697-2000
Fax: (415) 813-2045
Email: dallen@aghwlaw.com
nsyren@aghwlaw.com
erodas@aghwlaw.com
mhernandez@aghwlaw.com

Paul Caleo *Attorneys for Defendant Rowell Ranch*
Osmaan Khan *Rodeo, Inc.*
Gordon Rees Scully Mansukhani, LLP
1111 Broadway, Suite 1700
Oakland, CA 94607
Phone: (510) 463-8600
Fax: (510) 984-1721
Email: pcaleo@grsm.com
oakhan@grsm.com
khernandez@grsm.com